

More than one hundred radio station owners and/or operators submitted comments to the Commission regarding Digital Audio Radio Satellite Service in the 2310-2360 MHz Frequency Band. The comments that have been summarized in the following pages include examples of the observations and suggestions expressed by broadcasters to the Commission. The comments that were not summarized in this packet raised identical concerns and suggestions regarding the effect of SDARS on the existing terrestrial radio industry. Typical statements included:

- The additional fragmentation of the marketplace that SDARS will create will make local radio no longer profitable and will reduce the amount of community service and local programming.
- SDARS will do nothing to increase diversification of ownership and minority employment.
- There is no need for additional radio service. Docket 80-90 provided enough additional service.
- Rather than approve SDARS, the Commission should approve in band, on-channel DAB.

The following is a list of the stations and companies that submitted comments which were not summarized in this packet.

BROADCASTER	STATION(S)	CITY	STATE
ABS Communications	WKHK WBZU WROQ WJMZ	Richmond  Greenville	VA  SC
American National Broadcasting	WBRQ-FM WRPC-FM WPRA-AM	Caguas Mayaguez	PR PR
Apogee Communications, Inc.	KKND-AM	Tucson	AZ
Ashland Broadcasting Corporation	WNCO-AM/FM	Ashland	OH
Barry Broadcasting Co.	WBCH-FM	Hastings	MI
Big River Broadcasting Corporation	WQLT-FM WSBM-AM WXFL-FM	Florence	AL
Bresson-Hafler Media Group	**	Narberth	PA

BROADCASTER	STATION(S)	CITY	STATE
Broadcasters & Publishers, Inc.	WZMP-FM WJDQ-FM WMGP-AM	Meridian	MS
Brokensword Broadcasting Company	WQEL-FM WBCO-AM	Bucyrus	OH
BSB Communications	KQSY	Collinsville	OK
Burbach Broadcasting Company	**	Wheeling	WV
Butte Broadcasting Inc.	**	Butte	MT
Cane River Communications, Inc.	KNOC KDBH	Natchitoches	LA
Carephil Communications	KKBI-FM	Broken Bow	OK
Catamount Communications	KWKZ WWFO-FM WAIB-FM	Cape Girardeau Tallahassee ?	MO FL
Citywide Broadcasting of Lafayette, Inc.	KFXZ-FM	Lafayette	LA
Coast FM	WLJZ-FM	Mackinaw City	MI
Cromwell Group, Inc.	WYCQ-FM  WYDS-FM WFYR-FM  WLME-FM WKCM-FM WSHY-AM WEJT-FM  WHAL-AM WQZQ-FM	Nashville Shelbyville Decatur Peoria Elmwood Ownesboro Hawesville Shelbyville Decatur Shelbyville Shelbyville Nashville	TN/ IL IL/ IL KY KY IL IL/ IL TN TN
Crawford Broadcasting Company	KRBT-AM WYCA-FM KCBC-AM WMUZ-FM KPBC-AM KLZ-AM	Los Angeles Chicago San Francisco Detroit Dallas/F.Worth Denver	CA IL CA MI TX CO

BROADCASTER	STATION(S)	CITY	STATE
	KLT-AM	Denver	CO
	KJSL-AM	St. Louis	MO
	KSTL-AM	St. Louis	MO
	KPHP-AM	Portland	OR
	WDCX-FM	Buffalo	NY
	WDJC-FM	Birmingham	AL
	WDJC-AM	Birmingham	AL
	WDCZ-FM	Rochester	NY
	WDCW-AM	Syracuse	NY
Curtis Broadcasting Stations, Inc.	KFRO	Longview	TX
Curtis Media Group		Raleigh	NC
	WPTF	?	
	WQDR	?	
	WPCM	?	
	WKTC	?	
	WAZZ	?	
	WFMC	?	
	WCPS	?	
	WBBB	?	
	WGBR	?	
	WFLB	?	
	WEWO	?	
Dame Media Stations	WGY-AM WRVE-FM	Albany	NY
Entertainment Communications, Inc. (d/b/a ECI License Company, L.P.)	WDSY-FM WXRb-FM KMTT-FM KEGE KLDE-FM KITS-FM WKTK-FM WISP-FM WYUU-FM KFXX KGON-FM KNRK-FM	Pittsburgh " Tacoma Richfield Houston San Francisco Crystal River Holmes Beach Safety Harbor Oregon City Portland Camus	PA " WA MN TX CA FL FL FL OR OR WA
EZ Communications, Inc.	WSSS-FM WSOC-FM KBEQ-AM/FM WBYU-AM	Charlotte " Kansas City New Orleans	NC " ? LA

BROADCASTER	STATION(S)	CITY	STATE
	WEZB-FM	"	"
	WRNO-FM	"	"
	WIOQ-FM	Philadelphia	PA
	WUSL-FM	"	"
	WBZZ-FM	Pittsburgh	PA
	WZPT-FM	"	"
	KHTK-AM	Sacramento	CA
	KRAK-FM	"	"
	KNCI-FM	"	"
	KSD-AM/FM	St. Louis	MO
	KYKY-FM	"	"
	KMPS-AM/FM	Seattle	WA
	KZOK-FM	"	"
Fort Harrod Broadcasting Corp.	WHBN (AM/FM)	Harrodsburg	KY
Gillette Broadcasting Co.	KIML-AM KAML-FM	Gillette	WY
Golden Gulf Coast Broadcasting Inc.	**	Gulfport	MS
Goldman Radio Group	WJTN WWSE WVMT WXXX-FM	Jamestown " Burlington "	NY " VT "
Gross Communications Corporation	WLOQ-FM	Winter Park	FL
Heritage Media Corporation	KRPM-AM/FM	Bellevue	WA
Heritage Media Corporation (Kansas City)	KCFX-FM KCIY-FM	Kansas City	MO
Infinity Broadcasting Corporation	KRTH-FM	Los Angeles	CA
KAMO	KAMO AM-FM	Rogers	AR
KASI/KCCQ	KASI/KCCQ	Ames	IA
Kaspar Broadcasting Co., Inc.	WILO	Frankfort	IN
KBHB/KRCS	KBHB/KRCS	Sturgis	SD
KFOX 103	KFOX	Tulsa	OK

BROADCASTER	STATION(S)	CITY	STATE
KFTE	KFTE-FM KMDL	Lafayette	LA
KIKY	KIKY-FM	Round Rock	TX
KKHG	KKHG-FM	Tucson	AZ
KMAK	KMAK-FM	Orange Cove	CA
KMDL	KMDL	Lafayette	LA
KMRY Radio	KMRY	Cedar Rapids	IA
KNEM Communications, Inc.	KNEM-AM KNMO-FM	Nevada	MO
KNEN	KNEN-FM	Norfolk	NE
KNIN	KNIN-AM/FM	Wichita Falls	TX
Korn Palace Broadcasting, Inc.	KORN-AM Q107-FM	Mitchell	SD
KRAI	KRAI-AM/FM	Craig	CO
KSCJ/KSUX	KSCJ-AM KSUX-FM	Sioux City	IA
KSRQ-FM	KSRQ-FM	Thief River Falls	MN
KUPL & KKJZ	KUPL-AM/FM KKJZ-FM	Portland	OR
KUTZ-FM	KUTZ-FM	Austin	TX
KVEN Broadcasting Corporation	KVEN/KHAY	Ventura	CA
KVLI Radio, Inc.	KVLI-AM/FM	Lake Isabella	CA
KWKZ	KWKZ	Cape Girardeau	MO
KYKZ	KYKZ	Lake Charles	LA
KYYA-FM	KYYA-FM	Billings	MT

BROADCASTER	STATION(S)	CITY	STATE
K-101	K-101	Woodward	OK
K-104	K-104	Monroe	LA
Logan Broadcasting Corp.	WLGN (AM/FM) WVOW (AM/FM)	Logan	OH
Mid Columbia Broadcasting, Inc.	Q-104		OR
My Star Communications Corp.	WZPL-FM WTPI-FM WMYS-AM	Indianapolis	IN
New West Broadcasting Corp.	KWXX-FM KPUA-AM	Hilo	HI
New South Communications, Inc.	**	Meridian	MS
Oradio	**	n/a	n/a
Osland Broadcasting Co.	KMRN-AM KNOZ-FM	Cameron	OH
Pacific-Cascade Communications Corp.	KVIP-AM/FM	Redding	CA
PAG Broadcasting	KBHC-AM KNAS-FM	Nashville	AR
Pearl Broadcasting Inc.	WBEX-AM WKKJ	Chillicothe	OH
Power Country 99	WHCM	Parkersburg	WV
Radio AAHS	KID-AM	Phoenix	AZ
Radio Active Images	**	Monroe	LA
Saga Communications of Illinois, Inc.	WLRW WIXY-FM	Champaign	IL
Saga Communications of New England, Inc.	WAQY-AM/FM	E. Longmeadow	MA

BROADCASTER	STATION(S)	CITY	STATE
Salem Media Corporation	WMCA	Rutherford	NJ
Secret Communications	WDVE	Pittsburgh	PA
Sierra Broadcasting, Corp.	KSUE-AM	Susanville	CA
Sikeston Stations	KMPL-AM KS98-FM	Sikeston	MO
South Branch Communications	WELD AM/FM	Fisher	WV
Southern Horizons Broadcasting Corp.	WXRG-FM WXLS-AM	Biloxi	MS
S & S Communications Group, Inc.	WNCG	?	OH
Star 98	KZBB	Ft. Smith	AR/
	KEZU	Poteau	OK
	KBR5	Ft. Smith	AR/
		Booneville	AR
		Springdale	AR/
		Fayetteville	AR
WBEB	WBEB-FM	Philadelphia	PA
WCGQ	WCGQ-FM	Columbus	GA
WDAC Radio Company	WDAC-FM WBYN-FM	Lancaster Boyertown	PA PA
WEMP	WEMP-AM WMYX-FM	Hales Corners	WI
WFAN Sports Radio	WFAN	New York	NY
WGLF-FM	WGLF-FM	Tallahassee	FL
WJFK	WJFK-AM	Baltimore	MD
WJIM	WJIM-AM/FM	Lansing	MI
WJJY	WJJY	?	MN
WKTC	WKTC-FM	Goldsboro	NC

BROADCASTER	STATION(S)	CITY	STATE
WLAM	WLAM WZOU WKZS	Brunswick Portland Lewiston	ME ME ME
WLDR	WLDR-FM	Traverse City	MI
WLIF	WLIF-FM	Baltimore	MD
WLLH-AM	WLLH-AM	Lowell	MA
WLOW	WLOW-FM	Hilton Head	SC
WMAN	WMAN WYHT	Mansfield	OH
WMJB	WMJB-FM	Janesville	WI
WMQT (Q107)	WMQT	Ishperning	MI
WNKO-WHTH Radio	WNKO-FM WHTH-AM	Newark	OH
WNUS	WNUS	Vienna	WV
WOBL	WOBL-AM	Oberlin	OH
Woodward Communications, Inc.	WHBY WAPL	Appleton	WI
WPCM	WPCM (101.1)	Burlington	NC
WPOR	WPOR-AM/FM	Portland	ME
WRVQ/WRXL	WRVQ-FM WRXL-FM	Richmond	VA
WTTB	WTTB-AM	Vero Beach	FL
WWWY	WWWY	Columbus	IN
WXCO/WYCO	WXCO-AM WYCO-FM	Wausau	WI
WYMG	WYMG WQQL-FM	Springfield	IL



BROADCASTER	STATION(S)	CITY	STATE
Zimmer Broadcasting	KEZS-FM	Cape Girardeau	MO
	KZIM-AM	"	"
	KCLR-FM	Columbia-Jeff. City	"
	WKKK-FM	St. Louis	"
	KKLR-FM	Poplar Bluff	"
	KWOC-AM	"	"
	WOOZ-FM	Carbondale-Marion	IL

\*\* No stations referenced in letter

**Ashland Broadcasting Corporation  
WNCO AM/FM**

**Interest:** Radio station owner/operator

**General opposition to SDARS:**

- SDARS should not be considered for approval until after an in band, on-channel DAB system is approved and implemented for current terrestrial broadcasters.

**Effect of SDARS on conventional broadcasters:**

- The additional fragmentation of the marketplace SDARS will create will make local radio no longer profitable.
  - This will have devastating effects on community service and local programming.
  - The results will be devastating to more than 12,000 broadcasters.

**Bell Broadcasting Co.  
WCHB, WJZZ**

**Interest:** Broadcaster interested in leasing air time on SDARS

**General opposition to SDARS:**

- SDARS would not further the policy of diversification, because a free market approach to broadcasting would lead to the creation of monopolies or semi-monopolies. (¶ 2, 19-21)
- SDARS would not be in public interest, if a handful of licenses are issued to a few large companies, who will be permitted to offer multi-channel audio broadcast services by direct transmission from satellites. (¶ 3)
- If SDARS are made available to only three or four companies, should be subscription only, no advertising. (¶ 13-15)

**Licensing policies:**

- Same policies should be applied to satellite broadcasting allocations. (¶ 6)
- SDARS should be a common carrier service. (¶ 7)
- Bell does not support auctioning SDARS licenses.
  - Bell If SDARS are designated as common carriers then the licenses should not be auctioned because it would make lease rates excessive for small companies that might want to lease air time. (¶ 17-18)
  - If SDARS are designated as non-common carriers then the price paid for spectrum would eventually be passed on to consumers.

**Effect of SDARS on conventional broadcasters:**

- SDARS could take away every incentive to listen to local broadcasting by providing local news (with special radios and chips) and many new channels. (¶ 4)

**Regulatory classification:**

- SDARS should be classified as common carriers. (¶ 7-12)

- SDARS owners should not be allowed to control the programming broadcast over their facilities. (§ 3)

**Bogue Chitto Communication Company  
WBKN/WCHJ Radio**

**Interest:**      Radio station owner/operator

**Effect of SDARS on conventional broadcasters:**

- In Lincoln County, Missouri there are 30,000 residents and more than 20 radio signals. More channels are not needed. They will result in putting local stations out of business.

**Coast FM  
WLJZ FM**

**Interest:** Radio station owner/operator

**General opposition to SDARS:**

- There is no need for additional radio service. Docket 80-90 already had a devastating effect on small markets.

**Effect of SDARS on conventional broadcasters:**

- The additional fragmentation of the marketplace SDARS will create will make local radio no longer profitable.
  - This will have devastating effects on community service and local programming.
  - In Traverse City, Michigan, a town of only 14,000 people, there are already 21 radio signals and 12 stations selling time in the market.

**Community Pacific Broadcasting Company L.P.  
KFIV, KJSN, KVFX, KKSD, KASH, KBFX, KENI, KGGO, KHKI, KDMI**

**Interest:**      Broadcaster

**General opposition to SDARS:**

- SDARS would increase competitive pressures thereby reducing the incentive to broadcast local news and public affairs.
- SDARS would be largely redundant to the current service.
- SDARS would have no public interest standards
- SDARS is not actually a new technology, because must use repeaters.
- SDARS would occupy a large portion of valuable spectrum to supply an essentially redundant service.

**Effect of SDARS on conventional broadcasters:**

- SDARS would fragment radio audiences making small stations in smaller markets unprofitable, thereby destroying local stations.

**The Cromwell Group, Inc.**  
**WYCQ, WFYR, WKCM, WEJT, WQZQ, WMCI, WGLO, WEIC, WYDS,**  
**WLME, WSHY, WHAL, WCTZ, WKCM, WVLE, WBIO**

**Interest: Broadcaster**

**General opposition to SDARS:**

- Services provided by SDARS would be largely duplicative.
- SDARS should be a subscription service.

**Effect of SDARS on conventional broadcasters:**

- Unless it is a pay/subscriber service, SDARS would fragment radio audiences making small stations in smaller markets unprofitable, thereby destroying local stations.



**Curtis Media Group (Letter from Mr. Curtis)**  
**WPTF, WQDR, WPCM, WKTC, WAZZ, WFMC, WCPS, WBBB, WGBR,**  
**WFLB, WEWO**

**Interest:**      *Broadcaster*

**General opposition to SDARS:**

- SDARS would provide essentially the same formats already provided by local programming.
- No need for SDARS.

**Effect of SDARS on conventional broadcasters:**

- SDARS would fragment radio audiences making small stations in smaller markets unprofitable, thereby destroying local stations.

**Hanson Communications, Inc.**  
**WPHM**

**Interest:**      Broadcaster

**General opposition to SDARS:**

- Although SDARS would provide more programming to populations in extremely remote areas of the country, it will benefit less than 1 percent of the population.
- Although with SDARS one could receive the same programming while moving across the country without changing channels, it is not important and would actually hurt diversity, because people would not search the channels.

**Effect of SDARS on conventional broadcasters:**

- SDARS would eliminate advertisement of national products on local stations.
- SDARS would be able to provide a better format due to economies of scale causing local stations to lose business.
- SDARS would fragment radio audiences making small stations in smaller markets unprofitable, thereby destroying local stations.
- Local stations would be forced to cut local programming costs, including the ability to serve the local public in a manner that is needed for emergency service.
- Local stations, which are the training grounds for every major market person, would go out of business.

**Miscellaneous issues:**

- Government should establish ten or twelve studios in different regions to feed the satellite channels. These would be the only publicly funded radio broadcasters, and the remaining channels would either go dark, or be returned to the broadcasting industry.

## **KIKV**

**Interest:**      Broadcaster

### **General opposition to SDARS:**

- No need for more signals per market.
- SDARS would not actually provide more formats.
- It would be difficult or impossible to legally monitor formats aired by SDARS.
- SDARS would not offer diversification of ownership.
- SDARS would not serve any public interest or meet obligations conventional broadcasters must meet.

### **Effect of SDARS on conventional broadcasters:**

- SDARS would fragment radio audiences making small stations in smaller markets unprofitable, thereby destroying local stations.
- More broadcasters would be forced to sell, enter into LMAs, or duopolies.
- More broadcasters would have to air national programming rather than local programming with live announcers in order to remain financially competitive.

**Knox Broadcasting Corporation  
WMVO AM/WQIO FM**

**Interest:** Radio station owner/operator

**General opposition to SDARS:**

- SDARS will do nothing to provide local community service programming and emergency announcements.

**Effect of SDARS on conventional broadcasters:**

- If the Commission approved in band, on-channel DAB, terrestrial stations would be able to compete with SDARS, but not without it.
- The additional fragmentation of the marketplace SDARS will create will make local radio no longer profitable.
  - This will have devastating effects on community service and local programming.
  - Local stations provide emergency announcements and special messages about tornado warnings, severe winter weather, school cancellations and late school buses, company strikes, water shortages, funeral announcements, blood drives, utility outages, etc.

## **KRZR/KTHT**

**Interest:** Radio station owner/operator

### **Effect of SDARS on conventional broadcasters:**

- The additional fragmentation of the marketplace SDARS will bring will make local radio no longer profitable.
  - In Fresno, California there are already 32 stations serving 580,000 people.
  - SDARS will have devastating effects on community service and local programming.

**Paul Bunyan Broadcasting Co.  
KBUN, KBHP**

**Interest:**       Broadcaster

**General opposition to SDARS:**

- No need for more signals per market.
- SDARS would not actually provide more formats.
- It would be difficult or impossible to legally monitor formats aired by SDARS.
- SDARS would not offer diversification of ownership.
- SDARS would not serve any public interest or meet obligations conventional broadcasters must meet.

**Effect of SDARS on conventional broadcasters:**

- SDARS would fragment radio audiences making small stations in smaller markets unprofitable, thereby destroying local stations.
- More broadcasters would be forced to sell, enter into LMAs, or duopolies.
- More broadcasters would have to air national programming rather than local programming with live announcers in order to remain financially competitive.

**Salem Media Corporation  
WMCA**

**Interest:** Radio station owner/operator

**General opposition to SDARS:**

- SDARS will do nothing to increase diversification of ownership, minority employment or public service programming.
- The success of SDARS depends on the destruction of local radio stations' reliance on national advertisers.

**Effect of SDARS on conventional broadcasters:**

- The additional fragmentation of the marketplace SDARS will create will make local radio no longer profitable.
  - WMCA (New York's Christian Radio) looks to national advertisers for 50% of its revenue. If this revenue is lost to SDARS then WMCA will be forced to reduce its community service programming.

**Sound Broadcasters, Inc.  
WFMW AM/WKTG FM**

**Interest:** Radio station owner/operator

**General opposition to SDARS:**

- SDARS will do nothing to increase diversification of ownership or public service programming.

**Effect of SDARS on conventional broadcasters:**

- Rather than approve SDARS, the Commission should approve in band, on-channel DAB.
- The additional fragmentation of the marketplace SDARS will create will make local radio no longer profitable.
  - This will have devastating effects on community service and local programming.
  - In Madisonville, Kentucky there already 20 radio signals available to about 17,000 people.



## **WAZZ-FM**

**Interest:** Radio station owner/operator

### **Effect of SDARS on conventional broadcasters:**

- The additional fragmentation of the marketplace SDARS will bring will make local radio no longer profitable.
  - Enough damage has already been done by docket 80-90 and the break down of clear channel AM stations.
- SDARS will not provide local news weather and community information and service.
  - Competing against SDARS -- which will have no public service obligations -- will be difficult and unfair.

### **Regulatory classification:**

- The satellite DARS will not adopt alternative formats as their proponents claim.
  - Instead, they will attempt to quickly recoup their multimillion dollar investments by targeting mainstream audiences.